

UNITED STATES DISTRICT COURT

for the

Eastern District of Pennsylvania

United States of America

v.

Ronald Hilario Morantin-Mota

Case No. 25-MJ-351

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of February 18, 2025 in the county of Philadelphia in the
Eastern District of Pennsylvania, the defendant(s) violated:

Code Section

8 U.S.C. 1326(a)

Offense Description

Reentry of removed aliens

This criminal complaint is based on these facts:

See affidavit of Probable Cause.

☒ Continued on the attached sheet./s/ Damon Brown*Complainant's signature*TFO Damon Brown - ICE*Printed name and title*

Sworn to me telephonically in accordance with Fed. R. Crim. P. 4.1

Date: 02/19/2025

Carol Sandra Moore Wells Date: 2025.02.19 17:31:58
-05'00'

*Judge's signature*City and state: Philadelphia, PennsylvaniaHon. Carol S. Wells*Printed name and title*

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

AFFIDAVIT

1. I, Damon Brown, am a Deportation Officer at U.S. Immigration and Customs Enforcement (“ICE”) within the U.S. Department of Homeland Security (“DHS”). I have served as a Deportation Officer with ICE since April of 2008. As a Deportation Officer, I conduct investigations related to violations of the Immigration and Nationality Act, including investigations of foreign-born nationals, who have been deported from the United States and subsequently re-enter the United States illegally. I am currently assigned as a Task Force Officer from the Philadelphia ICE, Field Office Directorate, Office of Enforcement and Removal Operations (“ERO”) to the Philadelphia Special Agent in Charge, Office of Homeland Security Investigations (“HSI”), El Dorado Drug Task Force Division. As part of my duties, I investigate violations of “Title 8 of the United States Code (“U.S.C.”), including violations of immigration offenses.

2. I have prepared this affidavit in support of a criminal complaint against Ronal Hilario MORANTIN-Mota (“MORANTIN-MOTA”) where there is probable cause to believe that MORANTIN-MOTA, an alien, that is, an individual who is not a United States citizen or national, re-entered the United States after removal, in violation of 8 U.S.C. § 1326(a).

3. This affidavit is based on information I obtained from my personal observations, my training and experience, review of documentary evidence, and information provided to me by other members of the investigation. Because this affidavit is submitted only for the limited purpose of establishing probable cause for a criminal complaint and arrest warrant, it does not include all information known to the government as a result of the investigation.

PROBABLE CAUSE

4. During the month of January 2025, I became aware that Ronal Hilario MORANTIN-Mota had allegedly reentered the United States, after having been removed.
5. On January 23, 2025, the Homeland Security Investigations, Tip Line received a tip which alleged that MORANTIN-MOTA is residing with his girlfriend Pamela Sanchez at 1201 Princeton Avenue, Philadelphia, Pennsylvania and that MORANTIN-MOTA is operating a dark colored Lexus SUV with an Ohio registration. Based on this information, I opened an investigation into the illegal reentry of MORANTIN-MOTA.
6. As part of my investigation, I obtained numerous records and photographs pertaining to MORANTIN-MOTA and conducted several surveillance operations at the address provided in the tip. During my surveillance, I observed a dark colored Lexus with Ohio registration HZR1205. I queried this registration and learned that the vehicle is registered to Pamela Sanchez-Alvarez at 241 Autumn Ridge Circle, Pickerington, Ohio.
7. I conducted record checks in DHS databases to verify that, following MORANTIN-MOTA'S removal from the United States, he did not apply for, or was granted permission by the Attorney General or his successor, the Secretary of the Department of Homeland Security, allowing MORANTIN-Mota to reenter the United States following removal.
7. I know that DHS maintains a file on all aliens encountered by ICE. This file, known as the Alien File ("A-File"), contains documentation relating to the alien, including his/her photograph, warrants of deportation, fingerprints, documents reflecting criminal history, documents reflecting the country of citizenship, and other documents related to the lawful or

unlawful status the non-citizen has in the United States. Each non-citizen is assigned an identification number, referred to as the alien registration number.

8. I conducted further record checks in the National Crime Information Center (“NCIC”) for MORANTIN-MOTA’s criminal history, as well as his immigration history. Under the Alien number (208 459 919) and FBI number provided (LMR428PA5), it was found that MORANTIN-MOTA had previous encounters with ICE. I conducted further checks in databases for MORANTIN-MOTA’S immigration history in the United States. It was found that MORANTIN-MOTA had been removed from the United States to the Dominican Republic via ICE Air Operations on September 3, 2019. MORANTIN-MOTA’S alien file was requested for a complete review.

9. The A-File is numbered A208 459 919 and is maintained in the name of Ronal Hilario MORANTIN-MOTA with an alias of Jose Flores-Davila, matching the government’s electronic indices. I reviewed the alien file and determined that the electronic records contain this individual’s biographical information, family history, records of encounters, conviction records, photographs, and fingerprints. Based on the review of electronic records, I have concluded that it does in fact pertain to the individual in this matter. The A-File and electronic records reflects the following information relative to this individual:

- a. MORANTIN-MOTA is a citizen and national of the Dominican Republic.
- b. On or about August 14, 2015, in Laredo, Texas, MORANTIN-MOTA was arrested by the United States Border Patrol and processed for Expedited Removal to the Dominican Republic.

- c. On October 14, 2015, U.S. Citizenship and Immigration Services (“USCIS”) served a Notice to Appear to MORANTIN-MOTA placing his removal case before an immigration judge.
 - d. On September 14, 2017, MORANTIN-MOTA, was ordered removed from the United States to the Dominican Republic by an immigration judge.
 - e. On or about January 24, 2019, MORANTIN-MOTA was arrested and charged by the Pennsylvania State Police for Possession with the Intent to Distribute a Controlled Substance. MORANTIN-MOTA has an outstanding warrant in NCIC for failing to appear for that offense in the Allegheny County Court of Common Pleas in Pittsburgh, Pennsylvania.. (NCIC/W411856745)
 - f. On September 3, 2019, MORANTIN-MOTA was removed from the United States to the Dominican Republic via ICE Air Operations.
 - g. On September 3, 2019, an I-205 Warrant of Removal / Deportation was executed bearing MORANTIN-MOTA’s photograph, signature and fingerprint. Also, MORANTIN-MOTA was served an I-294 Warning to Alien Deported or Removed, warning MORANTIN-MOTA that he is prohibited from reentering the United States without authorization from the Attorney General or his successor, the Secretary of Homeland Security.
10. On February 18, 2025, at approximately 4:00 p.m., I observed the dark colored Lexus SUV with Ohio registration HZR1205 arrive at 1201 Princeton Avenue Philadelphia, Pennsylvania being operated by a Hispanic male of exact likeness to the known photographs of MORANTIN-MOTA. I encountered the male driver and determined that he was indeed

MORANTIN-Mota and placed him under arrest. Fingerprinting and booking were completed at the Philadelphia ICE Field Office and returned a positive match for FBI number LMR428PA5 and alien number A208 459 919.

11. MORANTIN-MOTA was advised of *Miranda* warnings in the Spanish language and signed a written statement. MORANTIN-MOTA admitted that he was removed from the United States in 2019 and returned without obtaining permission by illegally crossing the United States Border on foot from Mexico.

CONCLUSION

12. Based on the foregoing, I believe that there is probable cause to conclude that Ronal MORANTIN-MOTA, illegally re-entered the United States after removal, in violation of Title 8, United States Code, Section 1326(a).

/s/ Damon Brown

Damon Brown
Deportation Officer
Immigration and Customs Enforcement

SUBSCRIBED TO AND SWORN TO ME BY TELEPHONE IN ACCORDANCE WITH FED
R. CRIM. P. 4.1
THIS 19 DAY OF FEBRUARY 2025.

Carol Sandra Moore Wells Date: 2025.02.19 17:31:06 -05'00'

The Honorable Carol S. Wells
United States Magistrate Judge
Eastern District of Pennsylvania